



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 3, 2020

BY ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Rafael Valdovinos*, 19 Cr. 671 (VSB)

Dear Judge Broderick:

The parties respectfully write to request a 45-day adjournment of the status conference currently scheduled for December 4, 2020. The defendant has requested to meet with the Government in an effort to qualify for safety valve relief, pursuant to 18 U.S.C. § 3553(f). However, because of COVID-19-related limitations, the parties have been unable to arrange an in-person proffer. The Government also respectfully requests that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between December 4, 2020 and the date of the next status conference. The defendant, through his attorney Jeffrey Chartier, Esq., has no objection to the exclusion of time.

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 12/3/2020

Very truly yours,

AUDREY STRAUSS

Acting United States Attorney

by: 

Nicholas W. Chiuchiolo

Kyle A. Wirshba

Assistant United States Attorney

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The status conference scheduled for December 4, 2020 is hereby adjourned to January 20, 2021 at 9:00 a.m. The adjournment is necessary to permit the parties to continue to discuss a possible pretrial disposition of this matter. The Court finds that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between December 4, 2020 and January 20, 2021 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161 (h)(7)(A), in the interest of justice.

cc: Jeffrey Chartier, Esq. (by ECF)